

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALAN BRAHAMSHA, individually and on behalf of all others similarly situated,

No.: 2:16-cv-01667-RSM

*Plaintiff,*

STIPULATION AND [PROPOSED]  
ORDER TO EXTEND BRIEFING  
SCHEDULE ON DEFENDANT'S  
MOTION TO DISMISS

STARBUCKS CORPORATION, a  
Washington Corporation,

**NOTE ON MOTION CALENDAR:  
DECEMBER 2, 2016**

*Defendant.*

On November 15, 2016, Defendant Starbucks Corporation filed its motion to dismiss Plaintiff Alan Brahamsha's Class Action Complaint and Demand for Jury Trial (Dkt. #19). Pursuant to LCR 7(d)(3), Plaintiff's deadline to file opposition papers is December 5, 2016, and Defendant's deadline to file any reply papers is December 9, 2016. Plaintiff has represented that, since Defendant filed its motion, Plaintiff has worked diligently to prepare his opposition. Nevertheless, given the intervening holiday and in order to allow Plaintiff time to respond to the arguments raised in Defendant's motion, the Parties have conferred and agreed to ask the Court to extend the briefing schedule on the motion as follows:

1. Plaintiff's deadline to file his opposition to Defendant's motion to dismiss shall be December 12, 2016.

STIPULATION AND [PROPOSED] ORDER TO EXTEND  
BRIEFING SCHEDULE - 1  
CASE NO.: 2:16-CV-01667-RSM

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2. Defendant's deadline to file its reply in support of its motion to dismiss shall be December 23, 2016.

3. The noting date shall be December 23, 2016.

The Parties respectfully ask the Court to enter the order below setting this briefing schedule.

Respectfully submitted,

## STARBUCKS CORPORATION,

Dated: December 2, 2016

By: s/ Raina V. Wagner  
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**ALAN BRAHAMSHA**, individually and on behalf of all others similarly situated.<sup>1</sup>

Dated: December 2, 2016

By: s/ Benjamin H. Richman  
One of Plaintiff's Attorneys

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<sup>1</sup> Plaintiff is currently in the process of obtaining local counsel in this matter and expects that an appearance will be filed within a week.

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6 \* *Pro Hac Vice* Admission to be Sought

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10 [Proposed] **ORDER**

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12 Based upon the above stipulation, the Court hereby extends the briefing deadlines for  
13 Defendant's motion to dismiss (Dkt. 19) as follows:

14 1. Plaintiff's deadline to file his opposition to Defendant's motion to dismiss shall be  
15 December 12, 2016.

16 2. Defendant's deadline to file its reply in support of its motion to dismiss shall be  
17 December 23, 2016.

18 3. The noting date shall be December 23, 2016.

19 **IT IS SO ORDERED.**

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21 DATED this \_\_\_\_\_ day of December, 2016.

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19 THE HONORABLE RICARDO S. MARTINEZ  
20 CHIEF JUDGE

1 Presented by:

2 K&L GATES LLP

3 By s/ Raina V. Wagner

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11 Attorneys for Defendant  
12 Starbucks Corporation  
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STIPULATION AND [PROPOSED] ORDER TO EXTEND  
BRIEFING SCHEDULE - 4  
CASE NO.: 2:16-CV-01667-RSM

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1 CERTIFICATE OF ECF FILING AND SERVICE  
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3 I certify that on December 2, 2016, I arranged for electronic filing of the foregoing document with  
4 the Clerk of the Court using the CM/ECF system, and arranged for separate service to the following  
counsel for the parties of record:

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